

# EXHIBIT 15

Page 1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA on behalf of  
themselves and others similarly  
situated,

**Plaintiff,**

v. Case no. 1:19-cv-12235

QUOTEWIZARD.COM, LLC,

## Defendant.

2:21 p.m.

July 28, 2020

VIDEOTAPED VIRTUAL DEPOSITION of LEAD  
INTELLIGENCE INC., by and through GEORGE RIOS, a  
non-Party in the above entitled matter, pursuant  
to Subpoena, before Stephen J. Moore, a Registered  
Professional Reporter, Certified Realtime Reporter  
and Notary Public of the State of New York.

<p>1                   <b>GEORGE RIOS</b></p> <p>2 A P P E A R A N C E S</p> <p>3                   BRODERICK LAW PC</p> <p>4                   Attorneys for Plaintiffs</p> <p>5                   208 Ridge Street</p> <p>6                   Winchester, MA 01890</p> <p>7 BY: EDWARD A. BRODERICK, ESQ.</p> <p>8 NELSON MULLINS RILEY &amp; SCARBOROUGH</p> <p>9                   Attorneys for Defendant</p> <p>10                  One Post Office Square</p> <p>11                  Boston, MA 02109</p> <p>12 BY: KEVIN POLANSKY, ESQ.</p> <p>13 KLEIN MOYNIHAN TURCO LLP</p> <p>14                  Attorneys for RevPoint Media, LLC.</p> <p>15                  450 Seventh Avenue</p> <p>16                  New York, NY 10123</p> <p>17</p> <p>18 BY: EVAN KING, ESQ.</p> <p>19 MARION &amp; ALLEN</p> <p>20                  Attorneys for Plural Marketing</p> <p>21                  Solutions, Inc. and the Witness</p> <p>22                  488 Madison Avenue</p> <p>23                  New York, New York 10022</p> <p>24</p> <p>25 BY: ROGER MARION, ESQ.</p>	<p>Page 2</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2 am the videographer for Veritext New</p> <p>3 England. Our court reporter is Stephen</p> <p>4 Moore, also with Veritext New York.</p> <p>5 Please note I am not authorized to</p> <p>6 administer an oath I am not related to any</p> <p>7 party in this action, nor am I financially</p> <p>8 interested in the outcome.</p> <p>9 Counsel, please identify yourself</p> <p>10 and state your appearance for the record,</p> <p>11 beginning with the noticing attorney.</p> <p>12 MR. BRODERICK: Edward Broderick</p> <p>13 for the Plaintiff, Joseph Mantha.</p> <p>14 MR. POLANSKY: Good afternoon,</p> <p>15 Kevin Polansky for the Defendant,</p> <p>16 Quotewizard.</p> <p>17 MR. MARION: Roger Marion.</p> <p>18 And one correction, it's the</p> <p>19 deposition of George Rios on behalf of</p> <p>20 Plural Marketing Solutions, Inc., not just</p> <p>21 as an individual, and that is my client.</p> <p>22 MR. KING: And Evan King,</p> <p>23 representing RevPoint Media, LLC.</p> <p>24 THE VIDEOGRAPHER: Please swear</p> <p>25 in our witness.</p>
<p>1                   <b>GEORGE RIOS</b></p> <p>2                   THE VIDEOGRAPHER: We are on the</p> <p>3 record. The time is approximately 2:21</p> <p>4 p.m., on Tuesday, July 28th, 2020.</p> <p>5                   Please note microphones are</p> <p>6 sensitive and will pick up whispering and</p> <p>7 private conversations and cellular</p> <p>8 interference.</p> <p>9                   Please turn off all cell phones and</p> <p>10 place them away from your microphones as</p> <p>11 they will interfere with deposition audio.</p> <p>12                  Audio and video recording will</p> <p>13 continue to take place unless all parties</p> <p>14 agree to go off the record.</p> <p>15                  This is media unit 1 of the video</p> <p>16 recorded deposition of George Rios, taken</p> <p>17 for counsel for the Plaintiff in the</p> <p>18 matter of Joseph Mantha on behalf of</p> <p>19 themselves and others similarly situated</p> <p>20 versus Quotewizard.com, LLC.</p> <p>21                  The case is filed in the United</p> <p>22 States District Court for the District of</p> <p>23 Massachusetts, case number 1:19-CV-12235.</p> <p>24                  The deposition is being held via</p> <p>25 teleconference. I am Ken Williamson. I</p>	<p>Page 3</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2</p> <p>3 G E O R G E     R I O S , called as a witness,</p> <p>4 having been first duly sworn by the Notary</p> <p>5 Public, was examined and testified as</p> <p>6 follows:</p> <p>7</p> <p>8 EXAMINATION BY</p> <p>9 MR. BRODERICK:</p> <p>10</p> <p>11 Q   Good afternoon, Mr. Rios. Just</p> <p>12 a couple of quick ground rules.</p> <p>13                  I am going to ask you a series</p> <p>14 of questions, obviously, but I would just ask</p> <p>15 you to let me finish my question before you</p> <p>16 start your answer so that we have a clean</p> <p>17 record and it's easier to take down.</p> <p>18 A   Understood.</p> <p>19 Q   The other thing is all your</p> <p>20 answers will have to be verbal, meaning you</p> <p>21 can't nod or say um-hum. We will just need a</p> <p>22 full answer so that it's clear.</p> <p>23                  Can you tell me, state your full</p> <p>24 name for the record?</p> <p>25 A   George Rios.</p>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 6</p> <p>1           <b>GEORGE RIOS</b></p> <p>2   Q   Where are you employed?</p> <p>3   A   Plural Marketing Solutions.</p> <p>4   Q   What's your job title there?</p> <p>5   A   I am the owner.</p> <p>6   Q   Are you the CEO as well?</p> <p>7   A   Yes.</p> <p>8   Q   How many employees do you have, 9 if any?</p> <p>10   A   None.</p> <p>11   Q   How long have you owned Plural 12 Marketing Solutions?</p> <p>13   A   I founded the company around 14 March of 2017.</p> <p>15   Q   And what relationship, if any, 16 is there between Plural Marketing Solutions and 17 RevPoint Media, LLC?</p> <p>18   A   Now, none.</p> <p>19   Q   Formerly what relationship did 20 you have?</p> <p>21   A   As of what date?</p> <p>22   Q   Well, when did your relationship 23 stop?</p> <p>24   A   It stopped -- I mean, I would 25 have to go back and look at my records, I'm not</p>	<p style="text-align: right;">Page 8</p> <p>1           <b>GEORGE RIOS</b></p> <p>2   Q   Where did you work before 3 Plural?</p> <p>4   A   I held different positions 5 working with the computer science field at 6 different companies over the last 15 or 20 7 years.</p> <p>8   Q   Is Plural the first time you 9 were self-employed?</p> <p>10   A   Yes.</p> <p>11   Q   Does Plural Marketing Solutions 12 have any direct relationship with 13 Quotewizard.com?</p> <p>14   A   No.</p> <p>15   Q   Do you know who Adam Brown is?</p> <p>16   A   Not directly, no.</p> <p>17   Q   How about indirectly?</p> <p>18   A   His name became known to me 19 during this case.</p> <p>20   Q   Do you understand that at least 21 for purposes of this deposition, we are here to 22 determine the validity of the claim that my 23 client, Joseph Mantha, opted in to receive 24 calls or texts from Quotewizard.</p> <p>25           Do you understand?</p>
<p style="text-align: right;">Page 7</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 100 percent sure, but it stopped probably 3 around a year ago.</p> <p>4   Q   What did you do when you were 5 working with RevPoint, what did Plural 6 Marketing Solutions do with them?</p> <p>7   A   We are affiliate partners.</p> <p>8   Q   What is an affiliate partner?</p> <p>9   A   We basically broker consumer 10 information through our systems and pass those 11 records along so that they can ultimately be 12 sold into a larger marketplace so that the 13 requesting consumer can receive a quote on a 14 variety of services or products.</p> <p>15   Q   Do you have a background in 16 computer science?</p> <p>17   A   I do.</p> <p>18   Q   What's your education?</p> <p>19   A   College dropout.</p> <p>20   Q   And what did you study in 21 college when you were there?</p> <p>22   A   Computer science; yes.</p> <p>23   Q   Is Plural Marketing Solutions 24 your first job post-college?</p> <p>25   A   No.</p>	<p style="text-align: right;">Page 9</p> <p>1           <b>GEORGE RIOS</b></p> <p>2   A   That's my understanding.</p> <p>3           MR. MARION: Objection to form, 4 but obviously it's been answered.</p> <p>5   Q   Do you have any knowledge as to 6 whether Mr. Mantha consented to receive text 7 solicitations from Quotewizard?</p> <p>8   A   My understanding is that he did.</p> <p>9   Q   And what do you base that on?</p> <p>10   A   I don't send any text messages 11 or anything, but the record that we received 12 did indicate that there was an opt-in consent.</p> <p>13   Q   And from whom did you receive 14 that record?</p> <p>15   A   From one of my partners.</p> <p>16   Q   Which partner did you receive it 17 from?</p> <p>18   A   From a firm called Phoenix Media 19 Solutions.</p> <p>20   Q   Is there anything more to the 21 name, is it an LLC or an Inc.?</p> <p>22   A   I'm afraid I don't know.</p> <p>23   Q   Do you know where they are 24 located?</p> <p>25   A   Bosnia.</p>

<p style="text-align: right;">Page 10</p> <p>1           GEORGE RIOS      2     Q   How did Phoenix Media Solutions      3 provide -- what was the record that you      4 referenced?      5     A   The recording that was provided      6 to me by Phoenix was Mr. Mantha's contact      7 information along with some auto insurance      8 information indicating that he was interested      9 in an auto insurance quote at that time.      10    Q   Did the record that you received      11 from Phoenix Media Solutions indicate that he      12 had opted in to receive this information on a      13 website?      14    A   It did.      15    Q   What website?      16    A   SnappyAutoInsurance.      17    Q   Did you produce that record in      18 response to a subpoena issued to Plural in this      19 case?      20    A   I did.      21    Q   Let's look at Exhibit 22.      22       I will ask you to scroll down      23 after Exhibit C.      24    A   Yes, I see it.      25    Q   You see it? And it says at the</p>	<p style="text-align: right;">Page 12</p> <p>1           GEORGE RIOS      2     A   I'm sorry, I didn't catch that.      3     Q   You say the full record that you      4 received was sent.      5       And I was just asking to whom      6 was that sent?      7     A   It was provided to RevPoint.      8     Q   Did you send that to RevPoint      9 via an e-mail?      10    A   No, it was sent as part of the      11 original request.      12       And then it was sent -- sorry,      13 it was sent as part of the original request      14 when the transaction happened, and then it was      15 sent again I believe through my attorney to      16 either Mr. King or perhaps Mr. Polansky, I'm      17 not sure who, but the full record was sent.      18       What you are looking at here is      19 the TCPA audit that indicates when the person      20 actually filled out the form and on what site.      21    Q   And the TCPA audit, where did      22 that -- that we are looking at here in Exhibit      23 22, that came to you from Phoenix Media      24 Solutions in Bosnia?      25    A   Correct; yeah. I requested this</p>
<p style="text-align: right;">Page 11</p> <p>1           GEORGE RIOS      2 top "Original source lead generator"?      3     A   Right.      4     Q   Just so we are looking at the      5 same page.      6     A   Yes.      7     Q   Is this the record that you      8 received from Phoenix Media Solutions?      9     A   That's correct.      10    Q   Was it in exactly -- sorry?      11    A   That's, just a point of      12 clarification, this is the TCPA audits, which      13 is sent upon request in the event that there is      14 a discrepancy about whether or not the consumer      15 had consented.      16       And that's what this is.      17       The full record has also been      18 sent as part of the initial process when I was      19 first contacted.      20       That does contain some auto      21 insurance information as well as some      22 additional details that were provided on the      23 form.      24    Q   You say it has been sent. To      25 whom has it been sent?</p>	<p style="text-align: right;">Page 13</p> <p>1           GEORGE RIOS      2 when I was initially contacted by RevPoint that      3 there was an issue, and as part of our normal      4 process, I requested this information, and I      5 forwarded it to RevPoint so they would have it      6 for their records.      7     Q   And was this provided to you via      8 e-mail from Phoenix Media Solutions?      9     A   Correct.      10    Q   Do you still have that e-mail?      11    A   I forwarded it already to my      12 attorney, who I believe forwarded it off to      13 RevPoint for their records.      14       MR. BRODERICK: Okay, I will just      15 for the record say I don't believe we      16 have seen that e-mail, and we think it's      17 both responsive to the subpoena request      18 and the document request to Quotewizard      19 in the case, but I understand      20 Mr. Polansky has an objection.      21       MR. POLANSKY: What?      22       I have never seen that      23 documentation.      24       MR. BRODERICK: You haven't,      25 okay.</p>

<p style="text-align: right;">Page 14</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2                   MR. POLANSKY: I didn't lodge an 3                   objection, unless -- I can't object to 4                   something I haven't seen before.</p> <p>5                   MR. BRODERICK: Okay.</p> <p>6                   Well, that will be -- we will take 7                   that up with Roger, but I think that was 8                   responsive to our original subpoena.</p> <p>9                   MR. MARION: I don't see a more 10                  responsive request in my e-mail, which I 11                  am looking in right now and searching 12                  for the word Phoenix, but I will do a 13                  search with my client, and if we come up 14                  with a more expanded search, of course 15                  we will provide it.</p> <p>16                  MR. BRODERICK: Okay.</p> <p>17                  Q     So you got an e-mail from 18                  Phoenix Media Solutions. Was this page in the 19                  form of a separate document attached to the 20                  e-mail?</p> <p>21                  A     I don't recall, it was probably 22                  in the body of the e-mail, but I can't say for 23                  sure.</p> <p>24                  Q     Do you think that you then cut 25                  and pasted that information into this document?</p>	<p style="text-align: right;">Page 16</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2                   there are pages that follow that in the 3                   same document.</p> <p>4                   If he scrolls down, I am asking if 5                   those are the pages he's talking about as 6                   the expanded record.</p> <p>7                   MR. BRODERICK: Could you turn 8                   your mic up a little bit, Roger? You 9                   are a little faint.</p> <p>10                  MR. MARION: I will try and 11                  figure out how to do that.</p> <p>12                  MR. BRODERICK: Or get closer to 13                  the mic.</p> <p>14                  MR. MARION: Okay. Is that 15                  better?</p> <p>16                  MR. BRODERICK: That's better.</p> <p>17                  MR. MARION: I was saying in the 18                  same exhibit, as you scroll down, there 19                  is other insurance related pages, and I 20                  am wondering if that's what my client is 21                  talking about as the expanded 22                  information.</p> <p>23                  Q     Okay, you see what follows page 24                  14 of 20, it looks like, I'm not sure if it's a 25                  screen shot or how that was created, but it</p>
<p style="text-align: right;">Page 15</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2                  A     The document that we are looking 3                  at, yes.</p> <p>4                  MR. MARION: You can answer if 5                  you understand the question.</p> <p>6                  A     Are you asking me if I took the 7                  body of wherever I got this and placed it into a 8                  PDF?</p> <p>9                  I believe I did do that, yes, so 10                 that it would be in a clean format for e-mail.</p> <p>11                 Q     Okay, and do you still have that 12                 PDF?</p> <p>13                 A     I am sure it's in my e-mail, 14                 yeah.</p> <p>15                 MR. MARION: May I interject?</p> <p>16                 MR. BRODERICK: Please.</p> <p>17                 MR. MARION: Please take a look 18                 at the following pages. When you say 19                 expanded information, are you talking 20                 about the pages that follow the one you 21                 are looking at in the same exhibit?</p> <p>22                 THE WITNESS: Well, I am looking 23                 at page 14 of 20 of Exhibit 22, original 24                 source lead generator.</p> <p>25                 MR. MARION: Right. I am saying</p>	<p style="text-align: right;">Page 17</p> <p>1                   <b>GEORGE RIOS</b></p> <p>2                   looks like the web page</p> <p>3                   SnappyAutoInsurance.com.</p> <p>4                  A     Correct, yeah, that just looks 5                  like it's a screen shot.</p> <p>6                  What I was referring to 7                  specifically is what you asked me to look at in 8                  terms of the TCPA audit on that one page, which 9                  looks like it's 14 of 20. That's what I was 10                 referring to.</p> <p>11                 Q     Who is your contact at Phoenix 12                 Media Solutions?</p> <p>13                 A     Dario Osmancevic.</p> <p>14                 Q     Do you know how to spell 15                 Osmancevic?</p> <p>16                 A     Give me a second.</p> <p>17                 So Dario, so the last name is 18                 O-s-m-a-n-c-e-v-i-c.</p> <p>19                 MR. POLANSKY: O-s-m-a-n-c-e-v-i- 20                 c, yes, O-s-m-a-n-c-e-v-i-c.</p> <p>21                 Q     Do you have his e-mail address?</p> <p>22                 A     I can provide that, yes.</p> <p>23                 Q     Do you see on page 14 of 20 on 24                 Exhibit 22, Adam Brown? Sorry if I just asked 25                 you this, but do you know who Adam Brown is?</p>

<p style="text-align: right;">Page 18</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     A   I do not.</p> <p>3     Q   So the only reason that appears</p> <p>4 on this document is it was provided by Phoenix</p> <p>5 Media Solutions to you?</p> <p>6     A   Correct; correct.</p> <p>7     Q   Have you ever exchanged any</p> <p>8 e-mails with Adam Brown at that e-mail address?</p> <p>9     A   I have not.</p> <p>10    Q   What else if anything did</p> <p>11 Phoenix Media Solutions tell you about this</p> <p>12 lead?</p> <p>13    A   Just what you see here is what</p> <p>14 they have provided to me.</p> <p>15    Q   And what was your e-mail, what</p> <p>16 did your e-mail say to Phoenix Media Solutions</p> <p>17 when you were trying to find out the source of</p> <p>18 the consent?</p> <p>19    A   I gave him the contact</p> <p>20 information of the person that had reached out</p> <p>21 to I guess file the requests, and she looked it</p> <p>22 up and sent me what you see here.</p> <p>23    Q   When you sold this lead</p> <p>24 regarding Mr. Mantha to RevPoint, did you know</p> <p>25 Mr. Mantha's name at that point?</p>	<p style="text-align: right;">Page 20</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     A   I'm not able to do that, no.</p> <p>3     Q   And you said the e-mail address</p> <p>4 was validated. What did you mean by that?</p> <p>5     A   Meaning that it was a properly</p> <p>6 formed valid e-mail syntactically, there were</p> <p>7 no spaces in the domain, there was no</p> <p>8 semicolons or anything that would make it an</p> <p>9 invalid e-mail.</p> <p>10    Q   But you didn't send a test</p> <p>11 e-mail to that e-mail to see if it worked?</p> <p>12    A   No.</p> <p>13    Q   Did you do anything to check</p> <p>14 what the TCPA disclosure language, if any, was</p> <p>15 on the SnappyAutoInsurance website?</p> <p>16    A   No.</p> <p>17    Q   Are you familiar with a website</p> <p>18 called Autoinsurquotes.com?</p> <p>19    A   I saw it on the documentation in</p> <p>20 this case, but prior to that, no.</p> <p>21    Q   How about -- what's the other</p> <p>22 one, maybe -- how about Quotewizard?</p> <p>23    <b>MR. BRODERICK:</b> No, no, excuse</p> <p>24 me. Kevin, help me out.</p> <p>25    <b>MR. POLANSKY:</b> Unitedquotes.com.</p>
<p style="text-align: right;">Page 19</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     A   No.</p> <p>3     Q   And did you have it in your</p> <p>4 system, not what you remember, but that wasn't</p> <p>5 part of the lead that you sold?</p> <p>6       <b>MR. MARION:</b> Objection to form.</p> <p>7     You can respond if you understand the</p> <p>8 question.</p> <p>9     Q   Let me try to clean that up.</p> <p>10    What was on the lead that you</p> <p>11 sold to RevPoint?</p> <p>12    A   I'm not sure I understand. It's</p> <p>13 contact information.</p> <p>14    Q   But his name, the name Joe</p> <p>15 Mantha?</p> <p>16    A   Correct, yes. The address, the</p> <p>17 city, the state, the phone number, the fact</p> <p>18 that it was not on a DNC at the time, that</p> <p>19 phone number was not on a DNC at the time, the</p> <p>20 e-mail address had been validated, and I</p> <p>21 believe there was auto insurance information on</p> <p>22 there as well in terms of the make and model</p> <p>23 and year of his vehicle.</p> <p>24    Q   Did you do anything to validate</p> <p>25 that information yourself?</p>	<p style="text-align: right;">Page 21</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     <b>MR. BRODERICK:</b> Unitedquotes,</p> <p>3     thank you.</p> <p>4     Q   Unitedquotes.com?</p> <p>5     A   Thank you, yes. That is one of</p> <p>6 my properties.</p> <p>7     Q   That's one of your properties?</p> <p>8     A   Yes.</p> <p>9     Q   And when you say one of your</p> <p>10 properties, do you mean you own the domain for</p> <p>11 Unitedquotes.com?</p> <p>12    A   I own the domain for</p> <p>13 Unitedquotes.com, correct.</p> <p>14    <b>MR. MARION:</b> Objection to form.</p> <p>15    When you say "I" do you mean yourself or</p> <p>16 an entity?</p> <p>17    A   I mean Plural Marketing owns it.</p> <p>18    Q   Plural Marketing owns it.</p> <p>19    I am going to ask you to look at</p> <p>20 Exhibit 17 -- actually, sorry, let's go back to</p> <p>21 22, where we were.</p> <p>22    I just want to note a couple of</p> <p>23 things about this, page 14 of 20 of Exhibit 22.</p> <p>24    This is information you say you</p> <p>25 were provided by Phoenix Media Solutions.</p>

<p>1           <b>GEORGE RIOS</b></p> <p>2        It says the original source lead</p> <p>3 generator was SnappyAutoInsurance.com, correct?</p> <p>4       A That's correct, to my</p> <p>5 understanding.</p> <p>6       Q And is that one of your</p> <p>7 properties?</p> <p>8       A No.</p> <p>9       Q Do you have any relation to</p> <p>10 SnappyAutoInsurance.com?</p> <p>11      A None.</p> <p>12      Q Under applicant IP address --</p> <p>13      A Yes.</p> <p>14      Q -- I will ask you to write this</p> <p>15 down, because we are going to compare it to</p> <p>16 others. It's 96 -- hold on. 96.242.132.28.</p> <p>17      A Yes, I see it.</p> <p>18      Q And it also says that the</p> <p>19 applicant IP address is Morristown, New Jersey.</p> <p>20 Do you see that?</p> <p>21      A Yes, I see that.</p> <p>22      Q And the date of the application,</p> <p>23 and this is on the information provided to you</p> <p>24 by Phoenix Media Solutions in Bosnia, is</p> <p>25 6-26-2019 at 12:01 a.m.</p>	<p>Page 22</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       A That's the one that was attached</p> <p>3 to the record during the transaction.</p> <p>4       Q During which transaction?</p> <p>5       A When the record was initially</p> <p>6 sold.</p> <p>7       Q So by Plural to RevPoint?</p> <p>8       A Correct.</p> <p>9       Q Did Phoenix Media Solutions</p> <p>10 provide you with that Jornaya lead ID?</p> <p>11      A They provided a record that did</p> <p>12 not include this Jornaya lead ID.</p> <p>13      Q Then how did it get attached to</p> <p>14 the lead during the transaction?</p> <p>15      A I'm not entirely sure. I looked</p> <p>16 today to refresh my memory of this particular</p> <p>17 record, and I did not see that Jornaya lead ID</p> <p>18 attached.</p> <p>19           Then I looked further and saw</p> <p>20 that it was generated on my site, one of my</p> <p>21 sites, I'm not entirely sure how it got linked,</p> <p>22 but the original record didn't include it.</p> <p>23      Q Did you attach the Jornaya lead</p> <p>24 ID to this lead?</p> <p>25      <b>MR. POLANSKY:</b> Can I hear that</p>
<p>1           <b>GEORGE RIOS</b></p> <p>2       A That's what I see here, yes.</p> <p>3       Q And at the very bottom of this</p> <p>4 page it says, "Applicant agreed to receive</p> <p>5 promotional e-mails/calls/text/postal mails</p> <p>6 from third parties regarding his auto insurance</p> <p>7 application."</p> <p>8           What's your understanding of</p> <p>9 where that language came from?</p> <p>10      A I can't speak to that.</p> <p>11      Q But that was -- was that exact</p> <p>12 language provided to you by Phoenix Media</p> <p>13 Solutions in Bosnia?</p> <p>14      A It was.</p> <p>15      Q Now, let's go to Exhibit 17.</p> <p>16      A Yes.</p> <p>17      Q And here we have the same</p> <p>18 consumer IP address on this document as was on</p> <p>19 Exhibit 22, correct?</p> <p>20      A Yes, it looks like it.</p> <p>21      Q But this document has a Jornaya</p> <p>22 lead ID?</p> <p>23      A Yes.</p> <p>24      Q Did you have a Jornaya lead ID</p> <p>25 when you sold this lead to RevPoint?</p>	<p>Page 23</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       question again? I couldn't hear the</p> <p>3 question.</p> <p>4       Q Were you the one who attached</p> <p>5 the Jornaya lead ID to Mr. Mantha's lead?</p> <p>6       A No, I'm not sure how that</p> <p>7 happened.</p> <p>8       Q You don't know if someone at</p> <p>9 RevPoint did that?</p> <p>10      A I don't know.</p> <p>11      Q But are you sure that you were</p> <p>12 not provided that Jornaya lead ID by Phoenix</p> <p>13 Media Solutions in Bosnia?</p> <p>14      A It's possible. I have to look</p> <p>15 and doublecheck, I'm not sure.</p> <p>16      Q Can we look at Exhibit 18, and I</p> <p>17 can represent to you that this is a subpoena</p> <p>18 response in this case from Jornaya.</p> <p>19      A Yes.</p> <p>20      Q And that same Jornaya lead ID</p> <p>21 appears here, and I can also represent to you</p> <p>22 that Jornaya associates that lead ID with</p> <p>23 Unitedquotes.com.</p> <p>24      A Okay.</p> <p>25      Q Can you explain why a lead that</p>

<p style="text-align: right;">Page 26</p> <p>1           GEORGE RIOS      2 supposedly came from SnappyAutoInsurance has a      3 Jornaya lead ID that's associated with a site      4 to Unitedquotes.com, which is a domain that you      5 own?      6       A   Well, clearly it's a mistake,      7 because the lead was not sourced on      8 Unitedquotes.      9       Q   Do you have any personal      10 knowledge that it was sourced on      11 SnappyAutoInsurance.com?      12      A   Only what was provided to me by      13 Phoenix.      14      Q   And you don't know where Phoenix      15 got the lead, do you?      16      A   I do not.      17      Q   Has Phoenix ever told you      18 anything about how they get their leads that      19 they then sell to you?      20     A   No.      21     Q   Can you look at Exhibit 17,      22 which is the Quotewizard opt-in?      23     A   Yes.      24     Q   Do you see the language under      25 TCPA disclosure?</p>	<p style="text-align: right;">Page 28</p> <p>1           GEORGE RIOS      2       Q   Yes.      3       A   Yes.      4       Q   Was that a phone call or an      5 e-mail?      6       A   I don't recall.      7       Q   Do you still have your e-mails      8 from 2019?      9       A   I'm sure I have some. I mean      10 I --      11      Q   When you responded to the      12 subpoena to Plural Marketing Solutions in this      13 case, did you search for e-mails?      14      A   I did.      15      Q   And at that time did you have      16 them?      17      A   I provided everything that I      18 could find.      19      Q   And to whom did you provide it,      20 your counsel?      21      A   Yes.      22      Q   And did you send it to anyone      23 else?      24      A   So, I believe the order of      25 events were that I was contacted by RevPoint in</p>
<p style="text-align: right;">Page 27</p> <p>1           GEORGE RIOS      2       A   Yes.      3       Q   Did you provide that language to      4 RevPoint?      5       A   That may have also come from a      6 request from Phoenix to elaborate on what the      7 disclosure actually was at the time the      8 consumer filled out the form.      9       Q   So you got this TCPA disclosure      10 language from Phoenix Media Solutions in      11 Bosnia, correct?      12      A   Correct; yeah.      13      Q   Then did you in turn provide      14 that to RevPoint Media?      15      A   I did.      16      Q   And was that when -- after Mr.      17 Mantha complained that he had gotten a call or      18 rather a text message that he didn't want, were      19 you contacted by someone at RevPoint Media?      20      MR. MARION: Objection to form.      21      You can answer if you understand      22 the question.      23      A   Was I contacted by RevPoint      24 Media when the complaint was lodged to them, is      25 that the question?</p>	<p style="text-align: right;">Page 29</p> <p>1           GEORGE RIOS      2 regards to this particular issue, it may have      3 been over e-mail, I don't recall, or it could      4 have been a phone call.      5       They asked me to look into where      6 the particular record came from.      7       I responded with the standard      8 TCPA information that is required when these      9 complaints are lodged.      10      At which point I believe a few      11 weeks or months went by, and then I engaged my      12 counsel to work directly with the other lawyers      13 to basically exchange information, and I      14 started providing the documentation to my      15 attorneys, which in I guess just normal course      16 gave it to the other attorneys.      17      Q   You say the other attorneys.      18 Was that Mr. King?      19      A   I believe it was Mr. King, yes.      20      Q   How about Mr. Polansky?      21      A   I'm not sure who Mr. Polansky      22 represents.      23      Q   Quotewizard.      24      A   Okay, yeah, I don't think we had      25 any direct contact.</p>

<p style="text-align: right;">Page 30</p> <p>1           <b>GEORGE RIOS</b>      2     Q   With anybody for Quotewizard,      3   okay.      4     A   Right.      5     Q   Did you do any business with a      6   company called Blue Flame Media?      7     A   No.      8     Q   How about Seal Dog Media?      9     A   No.      10    Q   Does Plural Marketing Solutions      11 have a Jornaya account?      12    A   Yes.      13    Q   What kind of account is that?      14    A   It's a standard account.      15    Q   Are you a publisher, do you      16 know?      17    A   On their system I believe it's      18 set up to be a publisher.      19    Q   And can you generate your own      20 Jornaya lead IDs, or visits to --      21    A   Yes, yes.      22    Q   What websites does Plural      23 Marketing Solutions run?      24    A   Unitedquotes.      25    Q   Is that the only one?</p>	<p style="text-align: right;">Page 32</p> <p>1           <b>GEORGE RIOS</b>      2 capture TCPA disclosure language on the      3 Unitedquotes.com website?      4     A   I did. There is one there      5 presently.      6     Q   When did you install that?      7     A   I don't recall. It's been a      8 while.      9     Q   Was it on the system -- I mean,      10 Jornaya says they didn't capture any disclosure      11 language on 6/21/2019, or whoever visited from      12 that IP address, which is not the same as the      13 Quotewizard ID address.      14    A   Correct.      15    Q   Was it months after that that      16 you put the script on that would capture any      17 TCPA disclosure language on Unitedquotes.com?      18    A   I'm not sure.      19    Q   Did you add the language      20 following receipt of Mr. -- notice that Mr.      21 Mantha had complained that he received an      22 unsolicited text?      23    A   No.      24    Q   How do you know that?      25    A   Looking at this now, the TCPA</p>
<p style="text-align: right;">Page 31</p> <p>1           <b>GEORGE RIOS</b>      2     A   Yes.      3     Q   And for leads that you yourself      4 generate on Unitedquotes.com, and by you I mean      5 Plural Marketing Solutions, do you associate a      6 Jornaya lead ID with each of those visits?      7     A   Yeah, when one is generated,      8 yes.      9     Q   Let's go back to Exhibit 18, the      10 last page, 7 of 7 of Exhibit 18, which is the      11 Jornaya subpoena response.      12    A   Yes.      13    Q   So, for this Jornaya lead ID,      14 which you're not sure how it got associated      15 with Mr. Mantha's lead, do you see in the      16 second box on that last page it says, "TCPA      17 information witnessed by TCPA Guardian"?      18    A   Yes, I see that.      19    Q   And "Jornaya cannot verify TCPA      20 disclosure language because a disclosure was      21 not tagged on the website according to      22 Jornaya's standard instructions."      23    A   Yeah, I see that.      24    Q   Did the Unitedquotes website,      25 did you try to install a Jornaya script to</p>	<p style="text-align: right;">Page 33</p> <p>1           <b>GEORGE RIOS</b>      2 Guardian, I believe that's a separate script or      3 a separate setup that I don't believe is      4 currently on the Unitedquotes sites.      5     I believe all I have right now      6 is the generic lead ID script.      7     So I think that's why it's      8 coming back with it can't verify the      9 disclosure, because I don't believe it's      10 tagged, you know, based on Jornaya's standard.      11    Q   Okay, so you haven't added any      12 script which would capture your -- any      13 disclosure language on the Unitedquotes.com      14 website?      15    A   Correct.      16    Q   And did the Unitedquotes website      17 ever contain any disclosure that people signing      18 up there to receive a quote were agreeing to      19 receive a text message from Quotewizard.com?      20    MR. POLANSKY: Objection.      21    MR. MARION: The objection was as      22 to form. You can answer if you know,      23 but he's asking if you had a very      24 specific objection -- a very specific      25 notice.</p>

<p style="text-align: right;">Page 34</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       A I'm not even sure, I have to 3 look at the specific language, and I don't know 4 if it would contain any particular company like 5 Quotewizard.</p> <p>6       Q Right, I am looking at the 7 Unitedquotes.com terms and conditions as it 8 stands right now, and I don't see any 9 references to specific companies that might 10 market to visitors to the site.</p> <p>11     A Yeah, that would be --</p> <p>12     <b>MR. MARION:</b> If you understand 13 the question you can answer.</p> <p>14     I believe -- counsel, I said to my 15 client there is no standing question, so 16 I'm not sure why he's speaking.</p> <p>17     I'm waiting for counsel to ask a 18 question regarding what he's looking at.</p> <p>19     Q I guess I am asking, I mean it's 20 a website that you own, correct, 21 Unitedquotes.com?</p> <p>22     A Correct.</p> <p>23     Q And you are the sole 24 administrator of that website, correct?</p> <p>25     <b>MR. MARION:</b> Objection to form,</p>	<p style="text-align: right;">Page 36</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 the last step of the form does link out to this 3 page, and that you can see it yourself, it's on 4 Unitedquotes.com/partners.</p> <p>5       Q But you -- but you're clear that 6 Mr. Mantha didn't fill it out on 7 Unitedquotes.com?</p> <p>8       A No, because the information was 9 provided to me by Phoenix, that he had filled 10 it out and consented to the TCPA consent form 11 on SnappyAutoInsurance.</p> <p>12     Q How would you know to put 13 Quotewizard on Unitedquotes.com if you didn't 14 do business with them?</p> <p>15     <b>MR. POLANSKY:</b> Objection.</p> <p>16     <b>MR. MARION:</b> Objection to form.</p> <p>17     You can answer to the extent that you 18 know.</p> <p>19     A They are in the business, and 20 this is a list of virtually everybody who's in 21 the business, whether I do business with them 22 or not.</p> <p>23     Q Mr. Rios, my apologies if I 24 already asked you this. Do you know of a 25 website called Autoinsurquotes.com? And that's</p>
<p style="text-align: right;">Page 35</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 vagueness of "you."</p> <p>3       A That's correct.</p> <p>4       Q Have you ever had TCPA 5 disclosure language on your website which 6 stated that someone might get a text message 7 from Quotewizard.com?</p> <p>8       <b>MR. POLANSKY:</b> Objection, you can 9 answer.</p> <p>10     A So, I believe what the process 11 is, because it wouldn't necessarily be under 12 terms and conditions, but I believe the process 13 would be you actually have to go through, and 14 on the last step, where the consumer is 15 prompted for their contact information, there 16 is a TCPA disclosure at the bottom that does 17 link out to a page that lists out partners, and 18 on that partners' page, Quotewizard does 19 appear.</p> <p>20     Q Do you have a document that 21 shows us that with respect to Mr. Mantha's 22 lead?</p> <p>23     A Well, Mr. Mantha didn't fill out 24 the form on Unitedquotes.com, but I can tell 25 you that Unitedquotes.com's TCPA disclosure on</p>	<p style="text-align: right;">Page 37</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 insure without an E.</p> <p>3       A You mentioned it earlier, and I 4 wasn't familiar with that website until prior 5 to seeing it involved in this matter.</p> <p>6       <b>MR. BRODERICK:</b> Could we take a 7 five minute break. I may be close to 8 done.</p> <p>9       <b>MR. POLANSKY:</b> Sure, come back at 10 what, 3:15?</p> <p>11     <b>MR. BRODERICK:</b> Sure. Is that 12 okay with you, Mr. Rios?</p> <p>13     <b>THE WITNESS:</b> Yes, that's fine.</p> <p>14     <b>MR. LANDAU:</b> The time is 15 approximately 3:07. We are off the 16 record.</p> <p>17     (At this point in the proceedings 18 there was a recess, after which the 19 deposition continued as follows:)</p> <p>20     <b>THE VIDEOGRAPHER:</b> We are on the 21 record. The time is approximately 3:19 22 p.m. Please continue.</p> <p>23     Q Okay, Mr. Rios, I just want to 24 compare Exhibit 17 with Exhibit 22.</p> <p>25     We did talk about this, but I'm</p>

<p style="text-align: right;">Page 38</p> <p>1           <b>GEORGE RIOS</b>  2 still very confused how this Jornaya lead ID  3 came to be associated with Mr. Mantha's lead in  4 that your subpoena response didn't have a  5 Jornaya lead ID and the Quotewizard opt-in  6 does?  7           Do you know why that is?  8        A I don't.  9        Q And the Quotewizard opt-in,  10 which is Exhibit 17, has a lead date of 8/5/19,  11 whereas Exhibit 22, the Plural response, has a  12 lead date, a date of application of 6/26/2019  13 at 12:01 a.m.  14           Do you know the reason for that?  15        MR. POLANSKY: Objection.  16        MR. MARION: Objection as to  17 form, and actually as to asked and  18 answered.  19        Q Do you know why there are  20 different application dates between the  21 information that Plural provided and what's on  22 the Quotewizard form?  23        MR. POLANSKY: Objection to  24 characterization of lead date as the  25 application date.</p>	<p style="text-align: right;">Page 40</p> <p>1           <b>GEORGE RIOS</b>  2        A That's my address, yeah.  3        Q That's your personal address?  4        A Right.  5        Q Is there a different business  6 address for Plural Marketing Solutions?  7        A I have like a UPS store address  8 also that I typically use for mail that's like  9 a remote address.  10       Q What's the UPS address?  11       A That would be 220 Route 10, box  12 number 105 Succasunna, New Jersey.  13       Q How do you spell the city name?  14       A Hold on, sorry.  15       So, I'm sorry, I am a terrible  16 speller. It's S-u-c-c-a-s-u-n-n-a, New Jersey.  17       Q What's Plural Marketing's  18 website?  19       A Plmrkg.com.  20       Q Now, prior to the dispute with  21 Joseph Mantha, had you heard of the website  22 SnappyAutoInsurance.com?  23       A No.  24       Q Is Plural Marketing in the  25 business of generating its own leads?</p>
<p style="text-align: right;">Page 39</p> <p>1           <b>GEORGE RIOS</b>  2        MR. MARION: I join in the  3 objection.  4        Q If you know. If you don't know,  5 that's fine.  6        A I don't know.  7        MR. BRODERICK: Okay, I don't  8 think I have any further questions,  9 thank you.  10  11 EXAMINATION BY  12 MR. POLANSKY:  13  14       Q Okay, Mr. Rios. My name is  15 Kevin Polansky. I represent Quotewizard in  16 this case. I do have several questions, and I  17 will go through this as quickly as possible.  18       You said that you are the owner  19 of Plural Marketing Solutions, is that right?  20       A That's correct.  21       Q And where is Plural Marketing  22 Solutions located?  23       A New Jersey.  24       Q Is that 30 Kern Drive Flanders,  25 New Jersey?</p>	<p style="text-align: right;">Page 41</p> <p>1           <b>GEORGE RIOS</b>  2        A Not directly, no.  3        Q When you say not directly, what  4 do you mean by that?  5       A I mean generating means like  6 sending out e-mail or whatever, or  7 participating in SEO or search marketing. Is  8 that what you mean?  9       Q No, so I guess I will change my  10 question.  11       So, Plural Marketing owns  12 Unitedquotes.com, right?  13       A Correct.  14       Q And does Unitedquotes.com  15 generate leads?  16       A It does when I have traffic  17 driven to it, yes.  18       Q And when traffic is driven to  19 that website, do you then sell those leads?  20       A Yes.  21       Q Is there any other forms of lead  22 generation that Plural Marketing engages in?  23       A No.  24       Q Is Plural Marketing, for lack of  25 a better word, like a middleman, they buy leads</p>

<p>1           GEORGE RIOS      2 and then sell them, resell them?      3       A    Correct, through like a      4 ping/post mechanism.      5       Q    Did you use the ping/post in      6 this case with RevPoint?      7       A    I did.      8       Q    Did you --      9           MR. POLANSKY: Strike that.      10      Q    Did Plural Marketing purchase      11 the Mantha lead from Phoenix Media Solutions?      12      A    That's correct.      13      Q    You said Phoenix Media Solutions      14 is a partner. What do you mean by partner?      15 Are they just a company that you purchase leads      16 from?      17      A    Yes, we have a relationship that      18 they drive traffic to me, and I then turn      19 around and ping/post that traffic out to other      20 partners.      21           RevPoint happened to be one of      22 them at that time.      23      Q    How long have you had that      24 relationship with Phoenix?      25      A    Quite a while, probably over two</p>	<p>Page 42</p> <p>1           GEORGE RIOS      2       A    I don't know.      3           He is my contact, that's all I      4 can say.      5       Q    Do you usually contact him by      6 e-mail or phone or both?      7       A    E-mail.      8       Q    Have you discussed with Dario      9 SnappyAutoInsurance.com?      10      A    Just as it relates to this in      11 terms of asking him for additional contact      12 information when it was asked of me.      13      Q    Do you know whether he purchased      14 the lead from SnappyAutoInsurance.com?      15      A    I don't. That's just what he      16 sent to me when I requested for the TCPA      17 information.      18      Q    Did you pursue any diligence to      19 ensure that SnappyAutoInsurance.com was a valid      20 website?      21      A    I didn't know about      22 SnappyAutoInsurance until this.      23      Q    Was this the first lead      24 purchased from SnappyAutoInsurance?      25      A    I don't know. I don't</p>
<p>1           GEORGE RIOS      2 years.      3       Q    Just about --      4       A    I'm not sure exactly.      5       Q    Just about from the start of the      6 company?      7       A    Yes, soon after, thereabouts. I      8 would have to check, I'm not sure exactly.      9       Q    Do you own any share or --      10      MR. POLANSKY: Strike that.      11      Q    Do you have any ownership stake      12 in Phoenix?      13      A    No.      14      Q    Does Phoenix have a U.S.      15 location?      16      A    Not that I'm aware of. I don't      17 know.      18      Q    Do you have any contact      19 information for Dario?      20      A    Yes, I have his e-mail address.      21      Q    And what's his e-mail address?      22      A    It's CEO@Phoenixmedia.com, I      23 believe. But I would have to doublecheck that.      24      Q    Is he the only employee of      25 Phoenix?</p>	<p>Page 43</p> <p>1           GEORGE RIOS      2 necessarily always get the URLs, so I'm not      3 sure.      4       Q    Do you know if Dario has ever      5 spoken to Adam Brown?      6       A    I don't know. I assume, but I      7 don't know.      8       Q    And are you aware Adam Brown is      9 the owner of SnappyAutoInsurance.com?      10      A    Only through this process. I      11 don't know. I wasn't aware of that name prior      12 to this.      13      Q    Have you ever been at any time      14 to the SnappyAutoInsurance.com website?      15      A    Yeah, just to look at it after      16 it came up in this context.      17      Q    And at the time that you looked      18 at it, was it operative, was it still working?      19      A    Yes.      20      Q    Did you take any screen shots of      21 what you saw at that time?      22      A    Yeah, and I believe I sent them      23 off.      24      Q    Let's take a look at those      25 screen shots.</p>

12 (Pages 42 - 45)

<p>1           GEORGE RIOS      2         So let's turn to Exhibit 22.      3       A   Yes.      4       Q   I think they are at the very      5 bottom of the exhibit.      6       A   Yeah.      7       Q   Okay, so I am going to start, it      8 looks like pages 16 of 20. Is that what you      9 have?      10      A   Yes.      11      Q   And are these screen shots that      12 you personally captured from      13 SnappyAutoInsurance.com?      14      A   I believe they are, yes.      15      Q   Do you recall around what time      16 that you captured these images?      17      A   No, I don't.      18      It would have been around the      19 time that the -- it would have been around the      20 time that we had to produce the screen shots      21 for the information request, but I don't      22 remember exactly what date that was.      23      Q   Now do you see at the very top      24 there is a URL http://SnappyAutoInsurance.com/?      25      A   Yes, I see that.</p>	<p>Page 46</p> <p>1           GEORGE RIOS      2       Q   Do you know if you clicked in      3 all of these captures, these 58 captures?      4       A   I'm sorry, do I know if what?      5 I'm sorry.      6       Q   Sure. When you were on the      7 Wayback Machine website --      8       A   Yes.      9       Q   And you were scrolling through      10 these web images, do you know whether you      11 scrolled through all of the 58 captures? It      12 appears to be a hyperlink on the website?      13      A   No, I did not look through all      14 58.      15      Q   And there is a date here that      16 says September 6, 2019.      17      Do you know what that date      18 refers to?      19      MR. BRODERICK: Objection. This      20 is 10 March, 2014.      21      A   I'm not sure.      22      Q   Sure, let me rephrase the      23 question.      24      Do you see there is a period of      25 time, it says 10 March, 2014 to 6 September,</p>
<p>1           GEORGE RIOS      2       Q   Do you see where it says 58      3 captures?      4       A   Yes, I see that.      5       Q   Do you know what that refers to?      6       A   So, this isn't the actual      7 website, this is the Wayback Machine.      8       Q   What is it called?      9       A   The Wayback Machine. So the      10 SnappyAutoInsurance website has since gone      11 offline. I don't know when that happened      12 exactly.      13      But if you go to      14 WaybackMachine.com, that's the web archive and      15 that's where this screen shot came from.      16      Q   So if you go to      17 WaybackMachine.com -- so you went to      18 WaybackMachine.com?      19      A   To capture the images of the      20 website at that time, yeah, because I don't      21 believe the website was operational at that      22 time.      23      Q   Okay, so these images all come      24 from the Wayback Machine website?      25      A   That's correct, yeah.</p>	<p>Page 47</p> <p>1           GEORGE RIOS      2 2019?      3       A   Yes.      4       Q   Did you enter any sort of data      5 points when reviewing on the Wayback Machine      6 website?      7      MR. BRODERICK: Objection.      8      THE WITNESS: I heard an      9 objection. I don't know if I am allowed      10 to answer.      11      MR. MARION: Yes, to the best of      12 your recollection.      13      THE WITNESS: Sorry?      14      MR. MARION: Yes, you can answer,      15 yes.      16      THE WITNESS: I can't hear you,      17 sorry.      18      MR. MARION: If you recall, yes,      19 you can answer.      20      A   Oh, so I don't run the Wayback      21 Machine, but my understanding, the way that it      22 works is that there are 58 captures between      23 these two dates, and that's what those two      24 dates refer to.      25      You can click on either one of</p>

<p style="text-align: right;">Page 50</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 those direction arrows to go back in time or 3 forward in time, and this just happens to be 4 one of the earlier screen shots that I was able 5 to capture relative to the time frame that was 6 in question.</p> <p>7     Q    Okay, so this is only one of the 8 58 captures?</p> <p>9           <b>MR. MARION:</b> Objection to form.</p> <p>10    A    Yes, I mean, I don't -- yeah, I 11 didn't look at the other ones, I don't know.</p> <p>12    Q    And then if you go down to the 13 next page, this is another screen shot from the 14 WaybackMachine.com, is that right?</p> <p>15    A    Yes.</p> <p>16    Q    And the same is true for the 17 next page as well, is that right?</p> <p>18    A    Yes.</p> <p>19    Q    What about, is the same true for 20 the next two pages of this exhibit?</p> <p>21    A    I would assume yes. I haven't 22 looked, but yes, I just looked; yeah.</p> <p>23    Q    Where it says captures in each 24 page, is it fair to say you didn't click on all 25 the captures for each of these web pages?</p>	<p style="text-align: right;">Page 52</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     Q    Were you involved in the process 3 of submitting the lead from Phoenix to 4 RevPoint?</p> <p>5     A    So, Plural's system received the 6 lead from Phoenix and then passed it to 7 RevPoint.</p> <p>8     Q    And what's the name of your 9 system, your lead system?</p> <p>10    A    It's a proprietary system.</p> <p>11    Q    And what's the name of it? Does 12 it have a name?</p> <p>13    A    I mean, yeah, not really, it 14 doesn't really have a name, it's just one that 15 I wrote.</p> <p>16    Q    Do you refer to it as anything?</p> <p>17    A    Not really, no. I mean, it's 18 just a system.</p> <p>19    Q    So the system works 20 electronically, so Phoenix enters or transfers 21 the electronic data information of the lead to 22 Plural, and then you upload it into the 23 RevPoint site, is that how it works?</p> <p>24    A    Yes, so the information is 25 basically pinged to my system. My system in</p>
<p style="text-align: right;">Page 51</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     A    I did not.</p> <p>3     Q    Again, just to confirm, you 4 don't recall when you went onto the Wayback 5 Machine website?</p> <p>6     A    No.</p> <p>7     Q    Does Plural Marketing control 8 SnappyAutoInsurance.com's website?</p> <p>9     A    No.</p> <p>10    Q    Has it ever?</p> <p>11    A    No.</p> <p>12    Q    Have you ever personally spoken 13 to Adam Brown?</p> <p>14    A    No.</p> <p>15    Q    Now, you testified earlier that 16 you are the only employee of Plural Marketing, 17 is that right?</p> <p>18    A    That's correct.</p> <p>19    Q    And were you involved in the 20 process of submitting the bid from Phoenix to 21 RevPoint?</p> <p>22           <b>MR. POLANSKY:</b> Strike that.</p> <p>23    Q    The lead --</p> <p>24    Q    <b>MR. POLANSKY:</b> Let me just start 25 over.</p>	<p style="text-align: right;">Page 53</p> <p>1           <b>GEORGE RIOS</b></p> <p>2 turn then pings that information to RevPoint. 3 RevPoint will bid based on 4 whatever they are able to get when they ping it 5 out to their partners.</p> <p>6           And then there is a read share 7 that goes across everyone who is involved, and 8 that's basically it, and this happens in 9 seconds.</p> <p>10    Q    When the leads ping to your 11 site, do you get notification of it?</p> <p>12    A    No.</p> <p>13    Q    Is there any human interaction 14 on your end when the lead is pinged to your 15 system from Phoenix?</p> <p>16    A    No.</p> <p>17    Q    Now you testified earlier that 18 you went back before today's deposition to 19 review whether there was a Jornaya lead ID 20 associated with this lead, is that correct?</p> <p>21    A    Yes.</p> <p>22    Q    From the information that you 23 have reviewed so far, you have not found a 24 Jornaya lead ID from Phoenix to Plural, is that 25 correct?</p>

<p style="text-align: right;">Page 54</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       A    Right, I have to go back and 3 doublecheck.</p> <p>4       Q    But there was a Jornaya lead ID 5 from Plural to RevPoint, is that correct?</p> <p>6       A    Right, that's on the record.</p> <p>7       Q    And you don't know how the 8 Jornaya lead ID got connected or attached to 9 that lead when it went from Phoenix to you and, 10 you being Plural, to RevPoint, is that correct?</p> <p>11      A    Right.</p> <p>12      Q    Now, just because --</p> <p>13      MR. POLANSKY: Strike that.</p> <p>14      Q    You've testified that the source 15 of this lead is SnappyAutoInsurance.com, is 16 that right?</p> <p>17      A    That's correct.</p> <p>18      Q    It's not Unitedquotes.com, 19 right?</p> <p>20      A    It is not.</p> <p>21      Q    So, is it your position that 22 even though there was an erroneous Jornaya lead 23 ID associated with this lead, that doesn't make 24 the consent provided by the consumer invalid?</p> <p>25      MR. BRODERICK: Objection.</p>	<p style="text-align: right;">Page 56</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       A    That's -- I think so, yeah. I 3 mean, because I received the consent 4 information from Phoenix, and in the consent 5 information it does indicate that he did 6 provide consents. That's what I am basing that 7 off of.</p> <p>8           <b>MR. BRODERICK:</b> Objection, move 9 to strike.</p> <p>10      MR. POLANSKY: I couldn't hear, 11 what was it?</p> <p>12      <b>MR. BRODERICK:</b> I objected and 13 moved to strike, sorry.</p> <p>14      Q    Do you have --</p> <p>15      MR. POLANSKY: Strike that.</p> <p>16      Q    In reviewing for today's 17 deposition, what documents did you review?</p> <p>18      A    The documents that were on the 19 Veritext site, the complaint that was sent to 20 me some time ago, my response to the subpoena, 21 and I believe that's it.</p> <p>22      Q    And the lead information 23 transferred from Phoenix to Plural is all 24 electronic?</p> <p>25      A    Yes.</p>
<p style="text-align: right;">Page 55</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       <b>MR. MARION:</b> Objection to form. 3 You can respond if you understand.</p> <p>4       A    Can you rephrase that?</p> <p>5       Q    Sure.</p> <p>6           So, there was a Jornaya lead ID 7 associated with this lead when it went from 8 Plural to RevPoint, right?</p> <p>9       A    Right.</p> <p>10      Q    We have now looked at the 11 response received from Jornaya with respect to 12 this lead, right, and I think you've had a 13 chance to look at it?</p> <p>14      A    Right.</p> <p>15      Q    And that lead came from 16 Unitedquotes.com, right?</p> <p>17      A    Right.</p> <p>18      Q    So it doesn't appear to be 19 associated with the Mantha lead, is that right?</p> <p>20      A    That's correct.</p> <p>21      Q    And just because that lead or 22 that Jornaya ID isn't associated with Mantha, 23 doesn't mean Mantha didn't consent to the lead, 24 is that right?</p> <p>25      MR. BRODERICK: Objection.</p>	<p style="text-align: right;">Page 57</p> <p>1           <b>GEORGE RIOS</b></p> <p>2       Q    Does it look different than the 3 information that's provided on Exhibit 22?</p> <p>4           <b>MR. BRODERICK:</b> Objection.</p> <p>5       Q    In other words, despite the 6 form, I understand this is a PDF document, is 7 the information accessible by you, can it be 8 generated or printed out?</p> <p>9           <b>MR. BRODERICK:</b> Objection.</p> <p>10      A    This information you are looking 11 at I received from Phoenix, the information 12 that came across from the record I provided to 13 Mr. Moynahan.</p> <p>14      Q    Okay. Let me ask you this, and 15 I think you just answered it.</p> <p>16      So the information attached to 17 Exhibit 22 is what you received from Phoenix 18 after receiving the dispute, right?</p> <p>19      A    Yes.</p> <p>20      Q    And then your testimony is you 21 provided some other information to Mr. Moynahan 22 at the time of -- at what time?</p> <p>23      A    When it was requested I provided 24 the basic contact information that came across 25 with the record plus the auto insurance, like</p>

<p style="text-align: right;">Page 58</p> <p>1           <b>GEORGE RIOS</b>  2 the vehicle information, that would make it an  3 auto insurance quote.  4       Q I will turn your attention to  5 Exhibit number 19.  6       A Yes.  7       Q Go to the page 10 of 10.  8       A Page what, I'm sorry?  9       Q 10 of 10.  10      A 10 of 10.  11      <b>MR. MARION:</b> Exhibit 19 is 12  12 pages.  13      <b>MR. POLANSKY:</b> It's only 10 on  14 mine.  15      A Oh, wait, I see it, yes. 4 of  16 12 files.  17      Q I see.  18      A 10 of 10, yeah, yeah, yeah, I  19 see it, yeah.  20           So this is basically what I was  21 referring to earlier, this is the record, this  22 is the record that comes across when an auto  23 insurance record is put into the ping system.  24      Q So this is the information that  25 Plural provided to RevPoint?</p>	<p style="text-align: right;">Page 60</p> <p>1           <b>GEORGE RIOS</b>  2 information included therein from Mr. Mantha?  3           <b>MR. BRODERICK:</b> Objection.  4       A It's what I provided, that's  5 what I have.  6           It's what you are looking at on  7 Exhibit 22 where it says original lead source  8 generator, that's what the consent was that he  9 provided to me when I requested it.  10      Q Do you know if that was a screen  11 shot from the website, or if that was just a  12 summary of what he believes the consent stated?  13      A That's what he provided to me.  14 I don't know where he got it from.  15      Q Do you know what date of  16 application means on the information on Exhibit  17 22?  18      A I don't know, I'm not sure what  19 application is referring to.  20      Q The information that you  21 provided to Mr. Moynahan after receiving the  22 dispute, is that different, does it look  23 different, or is it in a different form than  24 what we just looked at in Exhibit 19?  25      A Hold on, in Exhibit 19?</p>
<p style="text-align: right;">Page 59</p> <p>1           <b>GEORGE RIOS</b>  2       A Correct; yeah.  3       Q Do you know why, if you look at  4 the IP address on --  5           <b>MR. POLANSKY:</b> Strike that, I'm  6 going to start over.  7       Q If you look at the IP address on  8 this document, can you write that down?  9       A Okay, yeah I've got it.  10      Q Let go back to Exhibit 22,  11 Plural's response. Same page as before, after  12 Exhibit C.  13      A Yes.  14      Q Do you know why the IP addresses  15 are different if they are both coming from  16 Plural?  17      A I can't say. Sometimes -- I  18 mean, I can't say exactly, but sometimes I do  19 know that the IP address changes from partner  20 to partner, because sometimes they append their  21 own server's IP address either through an  22 incorrect code or some other disconnect in  23 mapping.  24      Q Do you have any written  25 correspondence from Phoenix with the consent</p>	<p style="text-align: right;">Page 61</p> <p>1           <b>GEORGE RIOS</b>  2       Q Yes. So if you could turn again  3 to page 10 of 10.  4       A The last page?  5       Q Yes.  6       A Yes, so I think I sent both.  7           So, this is the full record of  8 what would have been sent to RevPoint, and then  9 the TCPA audit is a -- is not all of this  10 stuff?  11           It's just the TCPA relevant  12 information, and I believe I sent both to  13 Mr. Moynahan.  14      Q So the TCPA audit does not  15 include all of the information that Plural has  16 to this lead?  17      A All the information I have for  18 this lead is what is on page 10 of 10 of  19 Exhibit 19. That's everything that I have.  20      Q Okay, but would you agree page  21 10 of 10 of Exhibit 19, it doesn't include the  22 URL for SnappyAutoInsurance.com?  23      A I'm sorry?  24      Q Sure. On page 10 of 10 on  25 Exhibit 19, would you agree with me that</p>

<p style="text-align: right;">Page 62</p> <p>1           <b>GEORGE RIOS</b>  2 SnappyAutoInsurance.com is not included on that  3 page?  4       A    Yeah, I don't see it here.  5       Q    So Plural does have more  6 information than what's contained on this  7 document, right?  8       MR. MARION: Objection to form.  9       A    No.  10      MR. BRODERICK: Objection.  11      A    SnappyAutoInsurance was on the  12 TCPA audit, that's how I got that URL, both of  13 which were provided to Mr. Moynahan.  14      Q    Okay, I think I misunderstood  15 you, then. I thought you said all the  16 information that Plural has is on page 10 of 10  17 on Exhibit 19.  18       But now you've said that all the  19 information Plural has is on page 10 of 10 on  20 Exhibit 19 and on the TCPA audit we just looked  21 at, Exhibit 22, is that right?  22      MR. MARION: Objection to  23 characterization.  24      MR. BRODERICK: Objection.  25      Q    Let me ask it this way --</p>	<p style="text-align: right;">Page 64</p> <p>1           <b>GEORGE RIOS</b>  2       A    I believe I did.  3       Q    Other than that communication  4 with Michael Fishman about the dispute, how  5 many times have you spoken to Michael Fishman?  6       A    In what time frame?  7       Q    With respect to this lead?  8       A    We haven't spoken in a while.  9 We don't do business together anymore, yeah, I  10 couldn't even recall the last time I spoke to  11 him, but -- yeah, I can't even say. It's been  12 a while.  13      Q    Have you heard of a company  14 called Request Path Media, Inc.?  15      A    Yes.  16      Q    And how do you know the company?  17      A    That was another partner. I  18 believe that company is dissolved.  19      Q    Did you create that company?  20      A    No.  21      Q    Request Path was a company that  22 was a partner of Plural Marketing, is that  23 right?  24      A    No, that was not a partner, my  25 partner, so that was another entity that was,</p>
<p style="text-align: right;">Page 63</p> <p>1           <b>GEORGE RIOS</b>  2       A    I'm not -- yeah, sorry, I'm not  3 sure what you are asking.  4       Q    Sure.  5       So, in looking at page 10 of 10  6 on Exhibit 19, and in looking at the TCPA audit  7 that's been produced by Plural in response to  8 the subpoena, which is identified as Exhibit  9 22, is there any additional information that  10 Plural has with respect to this lead?  11      A    No.  12      MR. MARION: I object to form.  13      Q    Do you know Michael Fishman?  14      A    I know him, yes, I know him.  15      Q    Have you spoken to him about  16 this lead?  17      A    When it first became an issue,  18 yeah, he called me and had told me that there  19 was a complaint, and I said I would look into  20 it and try to get some information back to him.  21       And he put me in contact with  22 Mr. Moynahan at the time, and I provided the  23 TCPA audit that I got from Phoenix.  24      Q    Did you provide that information  25 by e-mail?</p>	<p style="text-align: right;">Page 65</p> <p>1           <b>GEORGE RIOS</b>  2 another marketing company that was at one point  3 affiliated with RevPoint, and I'm not sure who  4 else. I don't remember.  5       Q    How was Request Path Media  6 affiliated with RevPoint?  7       A    The same way that Plural  8 Marketing is affiliated, they were just  9 affiliated partners, sold traffic on a  10 ping/post tree.  11      Q    Does Request Path Media have  12 anything to do with Unitedquotes.com?  13      A    No.  14      Q    Have you ever worked for Request  15 Path Media?  16      A    Yes.  17      Q    What was your role at Request  18 Path Media?  19      A    Same thing, technology.  20      Q    Did you create Request Path  21 Media?  22      A    No.  23      Q    Just bear with me, I am trying  24 to move a document from a private folder to  25 this folder. I don't know how to do that.</p>

<p>1           <b>GEORGE RIOS</b></p> <p>2         MR. BRODERICK: You click the 3     button to the left of it, then you can 4     drag it.</p> <p>5         MR. POLANSKY: The problem is 6     they didn't give me like a folder. So 7     if I click exhibit, it goes into the 8     Plaintiff's Exhibit folder from the 9     other day.</p> <p>10        MR. BRODERICK: Meaning marked 11     exhibits?</p> <p>12        MR. POLANSKY: Yes.</p> <p>13        MR. BRODERICK: I think that's 14     okay, it will just be marked 15     sequentially.</p> <p>16        MR. POLANSKY: I don't think he 17     has access to the marked exhibits for 18     Joe Mantha.</p> <p>19        MR. BRODERICK: Oh, I see. Which 20     one is it?</p> <p>21        MR. POLANSKY: Which document?</p> <p>22        MR. BRODERICK: Which do you want 23     it moved into?</p> <p>24        MR. POLANSKY: I want to move in 25     a new document called a Request Path</p>	<p>Page 66</p> <p>1           <b>GEORGE RIOS</b></p> <p>2     would then come into the context of the divorce 3     and make it that much more difficult.</p> <p>4         So I transferred the ownership 5     to another person, and then we operated under 6     that company for a period of time, and then it 7     got shut down.</p> <p>8         Q     Okay. Is that when you created 9     RevPoint Media?</p> <p>10        A     I didn't create RevPoint Media.</p> <p>11        Q     Sorry, Plural Marketing 12     Solutions?</p> <p>13        A     Right.</p> <p>14        Q     At any point in time did Request 15     Path Media operate Unitedquotes.com?</p> <p>16        A     It might have been -- yeah, I 17     mean, I don't remember exactly, it might have 18     been a brand or one of the brands, but I don't 19     think it was actually. I don't recall.</p> <p>20        Q     Do you know anyone by the name 21     of Peter Petrov?</p> <p>22        A     No.</p> <p>23        Q     What about Mario Guerrero?</p> <p>24        A     No.</p> <p>25        Q     Justin Cohen?</p>
<p>1           <b>GEORGE RIOS</b></p> <p>2     Media Florida business filing 3     incorporation for Request Path Media.</p> <p>4         MR. BRODERICK: Okay, yeah, I 5     don't have that.</p> <p>6         MR. POLANSKY: No.</p> <p>7         Wait, I might have figured this 8     out. I don't know why they don't give me 9     access.</p> <p>10        Q     Let me ask you this question, 11     Mr. Rios. Did you incorporate Request Path 12     Media?</p> <p>13        A     The initial incorporation 14     possibly I was on, but it got transferred to 15     someone else, and it's kind of personal why, I 16     mean --</p> <p>17        Q     I mean, you understand that you 18     incorporated this company on March 3, 2015, is 19     that right?</p> <p>20        A     Yes, so I transferred it to -- 21     okay, so I was in the middle of, or I should 22     say I was in the beginning of a divorce.</p> <p>23         And that company was the company 24     that I was at the time had an ownership share, 25     and I was worried that that ownership share</p>	<p>Page 67</p> <p>1           <b>GEORGE RIOS</b></p> <p>2        A     No.</p> <p>3        Q     And I think this was asked, but 4     I apologize, I don't have it written down. 5     Have you heard of Blue Flame Marketing, Inc.?</p> <p>6        A     No, no.</p> <p>7        Q     How far is your address from 8     Morristown, New Jersey, your business address?</p> <p>9        A     Maybe 30 minutes, give or take.</p> <p>10        MR. POLANSKY: I think that might 11     be all I have. Just give me a moment.</p> <p>12         If you want we can go off or I can 13     just look at my notes. It doesn't matter.</p> <p>14        MR. BRODERICK: How long do you 15     want to go off for, Kevin?</p> <p>16        MR. POLANSKY: Three or four 17     minutes. I just want to collect my 18     thoughts. Come back around 4:02.</p> <p>19        THE VIDEOGRAPHER: Okay. The 20     time is approximately 3:57. We are off 21     record.</p> <p>22         (At this point in the proceedings 23     there was a recess, after which the 24     deposition continued as follows:)</p> <p>25        MR. LANDAU: We are on the</p>

<p style="text-align: right;">Page 70</p> <p>1           <b>GEORGE RIOS</b>      2       record, the time is approximately 4:02      3       p.m. Please continue.      4       Q   Mr. Rios, I only have a couple      5       of more questions.      6       Did you say that Phoenix Media      7       Solutions is located in Bosnia?      8       A   Yes.      9       Q   Do you know if Dario, I can't      10     pronounce his last name, lives in Bosnia or      11     some other location?      12      A   To my knowledge he lives in      13      Bosnia, but I'm not sure.      14      Q   How did you meet Dario?      15      A   I don't recall.      16      Q   How did you get in touch with      17      Phoenix?      18      A   Someone made an introduction at      19      some point, I don't remember where, through      20      e-mail, and we started talking over e-mail and      21      that was it.      22      I sent him my spec, that was it.      23      I mean, it's sort of like the      24      same way that I got engaged with RevPoint or      25      anybody else.</p>	<p style="text-align: right;">Page 72</p> <p>1           <b>GEORGE RIOS</b>      2       <b>MR. POLANSKY:</b> No further      3       questions. Thank you for your time.      4       <b>MR. MARION:</b> No, no, we are not      5       done yet. First of all, Ted, do you      6       have any more questions?      7       <b>MR. BRODERICK:</b> I do not. Thank      8       you, Roger.      9       <b>MR. MARION:</b> So I am going to ask      10      a couple of follow-up questions just      11      because you guys didn't.      12      13 EXAMINATION BY      14 <b>MR. MARION:</b>      15      16      Q   So, do you have a contractual      17      relationship with Phoenix?      18      A   Yes, I do.      19      Q   Did Phoenix make any      20      representations in its contract regarding TCPA      21      compliance?      22      A   Yes. He said everything he sold      23      to me would be compliant and he would be able      24      to provide that documentation in the event that      25      it was necessary.</p>
<p style="text-align: right;">Page 71</p> <p>1           <b>GEORGE RIOS</b>      2       Q   You testified earlier that on      3       the Unitedquotes website you only have the      4       generic lead ID script for Jornaya, is that      5       correct?      6       A   That's correct.      7       Q   What comes with the generic lead      8       ID script? In other words, what's captured by      9       that script?      10      A   I don't know, I can't really      11      speak to Jornaya's technology.      12      Q   But the consent information is      13      not tagged with the script?      14      <b>MR. MARION:</b> Objection to form.      15      You can answer to the extent you know.      16      A   I don't really know how that      17      piece works.      18      It doesn't look like it is      19      working correctly based on what I saw here, and      20      I would need to look at it further and      21      understand what's wrong. I don't know.      22      Q   Do you have any understanding      23      for why the Jornaya lead ID was attached to the      24      lead when provided to RevPoint?      25      A   No.</p>	<p style="text-align: right;">Page 73</p> <p>1           <b>GEORGE RIOS</b>      2       Q   And did it warrant compliance in      3       any way?      4       A   Yes, I believe that's what the      5       contract states.      6       <b>MR. MARION:</b> Nothing further.      7       <b>MR. LANDAU:</b> Anyone else have any      8       questions?      9       <b>MR. POLANSKY:</b> I just have one      10      follow-up.      11      12 CONTINUED EXAMINATION BY      13 <b>MR. POLANSKY:</b>      14      15      Q   Does Plural have a contract with      16      RevPoint?      17      A   Not active.      18      Q   Right, but did it have a      19      contract requiring TCPA compliance from Plural?      20      A   Yes; I believe that was part of      21      the agreement as well.      22      <b>MR. POLANSKY:</b> Okay, nothing      23      further.      24      <b>MR. BRODERICK:</b> Nothing further      25      from me. Thank you, Mr. Rios.</p>

<p>1           <b>GEORGE RIOS</b>  2         THE WITNESS: Thank you very  3         much.  4         THE VIDEOGRAPHER: This concludes  5         today's testimony given by George Rios  6         consisting of one media unit and it will  7         be retained by Veritext New England.  8         At this time it is 4:06 p.m. We  9         are off the record.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 74</p> <p>1           <b>GEORGE RIOS</b>  2         DECLARATION UNDER PENALTY OF PERJURY  3         Case Name: MANTHA v. QUOTEWIZARD  4         Date of Deposition: July 28,  5         2020  6  7         I, GEORGE RIOS, hereby certify  8         Under penalty of perjury under the  9         laws of the State of New York that the  10       foregoing is true and correct.  11       Executed this _____ day of  12       _____, 2020, at  13       _____.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18       <b>GEORGE RIOS</b></p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1           <b>GEORGE RIOS</b>  2  3  4         I, the undersigned, a Certified  5         Shorthand Reporter of the State of New  6         York, do hereby certify:  7         That the foregoing proceedings were  8         taken before me at the time and place  9         herein set forth; that any witnesses in  10       the foregoing proceedings, prior to  11       testifying, were duly sworn; that a record  12       of the proceedings was made by me using  13       machine shorthand which was thereafter  14       transcribed under my direction;  15       That the foregoing transcript is a  16       true record of the testimony given.  17       Further, that if the foregoing  18       pertains to the original transcript of a  19       deposition in a federal case before  20       completion of the proceedings, review of  21       the transcript [ ] was [x] was not  22       requested.  23       I further certify I am neither  24       financially interested in the action nor a  25       relative or employee of any attorney or         party to this action.</p> <p>16       IN WITNESS WHEREOF, I have this</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 75</p> <p>1           <b>GEORGE RIOS</b>  2         DEPOSITION ERRATA SHEET  3         Case Name: MANTHA v. QUOTEWIZARD  4         Name of Witness: GEORGE RIOS  5         Date of Deposition: July 28,  6         2020  7         Reason Codes: 1. To clarify the  8         record.  9         2. To conform to the facts.  10       3. To correct transcription errors.  11       Page ____ Line ____ Reason ____  From _____ to _____  12       Page ____ Line ____ Reason ____  From _____ to _____  13       Page ____ Line ____ Reason ____  From _____ to _____  14       Page ____ Line ____ Reason ____  From _____ to _____  15       Page ____ Line ____ Reason ____  From _____ to _____  16       Page ____ Line ____ Reason ____  From _____ to _____  17       Page ____ Line ____ Reason ____  From _____ to _____  18       Page ____ Line ____ Reason ____  From _____ to _____  19       Page ____ Line ____ Reason ____  From _____ to _____  20       Page ____ Line ____ Reason ____  From _____ to _____  21       Page ____ Line ____ Reason ____  From _____ to _____  22       Page ____ Line ____ Reason ____  From _____ to _____  23       Page ____ Line ____ Reason ____  From _____ to _____  24       Page ____ Line ____ Reason ____  From _____ to _____</p> <p>25</p>

20 (Pages 74 - 77)

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1           GEORGE RIOS  
2           DEPOSITION ERRATA SHEET  
3 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
4 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
5 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
6 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
7 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
8 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
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9 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
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13 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
14 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
15 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
16 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
From \_\_\_\_\_ to \_\_\_\_\_  
17 \_\_\_\_\_ Subject to the above  
18 changes, I certify that the transcript is  
19 true and correct  
20 \_\_\_\_\_ No changes have been  
21 made. I certify that the transcript is  
22 true and correct.  
23  
24  
25       GEORGE RIOS